



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OCT - 3 2014

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Steve Gapp
Branch Manager
Crop Production Services
3005 Rocky Mountain Avenue
Loveland, Colorado 80538

Re: Risk Management Program Compliance Inspection
Crop Production Services
3630 Brooklake Road NE, Salem, Oregon 97303
EPA Facility ID Number 1000 0005 6529

Dear Mr. Gapp:

On May 16, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Crop Production Services facility, located at 3630 Brooklake Road NE, Salem, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

Process Hazard Analysis requirements: Crop Production Services failed to retain the PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process as required by 40 C.F.R. § 68.67(g). Crop Production Services was unable to produce the PHAs done prior to 2006 that they were required to retain for their records.

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at:

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. In the future, if additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,

Kelly McFadden
Manager
Pesticides and Toxics Unit